

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**ROBERT REYNOLDS**

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)

**CASE NO: 1:06-CR-124-WHA**

**UNOPPOSED MOTION TO CONTINUE SENTENCING**

**COMES NOW** the Defendant, Robert Reynolds (“Mr. Reynolds”), by undersigned counsel, Christine A. Freeman, and respectfully moves that the sentencing hearing, now set in this matter for September 11, 2007, be continued to a later date.

In support of this motion, the Defendant would show the following:

1. Mr. Reynolds has been diagnosed with lymphoma and is undergoing treatment for this disease and for related symptoms.
2. He began a new round of daily radiation on August 20, 2007. It is expected that this round of radiation will last a minimum for four weeks.
3. The treatments are making Mr. Reynolds very weak.
4. Therefore, undersigned counsel is asking for more time before Mr. Reynolds must appear in District Court regarding his sentencing hearing.
5. Counsel for the prosecution has authorized undersigned counsel to state that the prosecution does not oppose this motion.
6. Mr. Reynolds is under the additional care of Dr. Steven Stokes, M.D. of Dothan, Alabama at 334-793-8081. A note from Dr. Stokes is being simultaneously submitted to the Court, in support of this Motion.

**WHEREFORE**, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:  
  
Susan Redmond, Esq., Assistant United States Attorneys, One Court Square, Montgomery, AL 36104.

**s/Christine A. Freeman**  
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